

**From:** [Chen, Isaac](#)  
**To:** [Angove, Sharon](#)  
**Cc:** [Houston, Robert](#)  
**Subject:** Re: Fw: Hercules Offshore Liftboats  
**Date:** Thursday, February 07, 2013 9:35:25 AM

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Our GMG GP does not cover liftboats. But, we may not be able to issue individual permits to all liftboats. So, the best way to get coverage, in case they need discharges, is to file eNOIs for liftboats. I was thinking if they need to discharge deck drainage when it rains but they don't have permits. Liftboats are not required to file eNOIs. Jennifer told me that their liftboats don't discharge. Instead they hold their wastewater and discharge to an onshore facility. So, they don't need permits at all. 6EN may deny eNOI for liftboats and make them no discharge. Actually, they still can discharge grey water when boats are traveling.

Isaac Chen

Environmental Engineer

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**From:** Sharon Angove/R6/USEPA/US  
**To:** Isaac Chen/R6/USEPA/US@EPA  
**Cc:** Robert Houston/R6/USEPA/US@EPA  
**Date:** 02/07/2013 09:05 AM  
**Subject:** Fw: Hercules Offshore Liftboats

Isaac,

Shannon stated she had spoken with you about the liftboats and that you told her she would need our OCS general permit coverage. So, when I assisted Shannon it was based on that information and I guided her on how to do the eNOI and eNOT, plus NetDMR as she terminates her liftboats.

Jennifer is stating another statement from you was made regarding liftboats, which is not the same as what Shannon said that you told her.

Please provide clarification on liftboats so that Robert and I can reply accurately on this issue when we receive

questions from the industry on liftboats.

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Ms. Sharon Angove

Environmental Protection Specialist (6EN-WC)

NPDES Compliance Section

Compliance Assurance and Enforcement Division

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OBSERVATION: "DANCE as though no one is watching you; LOVE as though you have never been hurt before; SING as though no one can hear you; LIVE as though heaven is on earth." souza

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----- Forwarded by Sharon Angove/R6/USEPA/US on 02/07/2013 09:01 AM -----

From: Jennifer May Guidry <[jmay@herculesoffshore.com](mailto:jmay@herculesoffshore.com)>

To: Robert Houston/R6/USEPA/US@EPA, Isaac Chen/R6/USEPA/US@EPA, Sharon Angove/R6/USEPA/US@EPA

Date: 02/05/2013 02:20 PM

Subject: Hercules Offshore Liftboats

Good afternoon,

I spoke with all of you on 12/5/2012 regarding the Hercules Offshore MODUs and the requirements for the eNOIs and during that conversation I asked about if our Liftboat fleet was covered under this permit and Robert & Isaac stated that Liftboats are not covered under the general permit because they are not engaged in production, drilling or exploration.

I received a phone call from Shannon Dubois at Stone Energy who has indicated that based upon a conversation she had with Sharon & Isaac on 2/1/2013 that now EPA is saying that Liftboats are covered.

Liftboats are not engaged in production, drilling or exploration.

They have a crane and usually 3-4 persons on-board that travel to a well location to provide crane support and serve as a temporary utility support vessel (it is just a stable working surface)

Liftboats move upwards of 10 times per day.

Hercules Offshore Liftboats does not engage in any well-servicing; we are a utility support vessel that provides a stable work surface over the ocean.

I am happy to discuss via email or over a conference call at your earliest convenience

Thank you, Jennifer

Jennifer May Guidry, CHMM

Director Corporate QHSE & Management System

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